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11 *Attorneys for Plaintiff, Deutsche Bank National Trust Company, as Trustee, in Trust for the*  
12 *Registered Holders of Morgan Stanley ABS Capital I Trust 2004-HE8, Mortgage Pass-Through*  
13 *Certificates, Series 2004-HE8*

14 **UNITED STATES DISTRICT COURT**  
15 **DISTRICT OF NEVADA**

16 DEUTSCHE BANK NATIONAL TRUST  
17 COMPANY, AS TRUSTEE, IN TRUST FOR  
18 THE REGISTERED HOLDERS OF  
19 MORGAN STANLEY ABS CAPITAL I  
20 TRUST 2004-HE8, MORTGAGE PASS-  
21 THROUGH CERTIFICATES, SERIES 2004-  
22 HE8,

23 Plaintiff,

24 vs.

25 FIDELITY NATIONAL TITLE GROUP,  
26 INC.; FIDELITY NATIONAL TITLE  
27 INSURANCE COMPANY; FIDELITY  
28 NATIONAL TITLE AGENCY OF  
NEVADA, INC.; DOE INDIVIDUALS I  
through X; and ROE CORPORATIONS XI  
through XX, inclusive,

Defendants.

Case No.: 2:20-cv-01606-APG-BNW

**STIPULATION AND ORDER TO  
EXTEND TIME PERIOD TO  
RESPOND TO MOTIONS TO DISMISS  
[ECF Nos. 13-15]**

**[First Request]**

COMES NOW Plaintiff Deutsche Bank National Trust Company, as Trustee, in Trust for  
the Registered Holders of Morgan Stanley ABS Capital I Trust 2004-HE8, Mortgage Pass-  
Through Certificates, Series 2004-HE8 (“Deutsche Bank”), Defendants Fidelity National Title  
Insurance Company (“FNTIC”), Fidelity National Title Agency of Nevada, Inc. (“Fidelity

1 Agency”), and Specially-Appearing Defendant Fidelity National Title Group, Inc. (“FNTG”)  
2 (collectively, the “Parties”), by and through their counsel of record, hereby stipulate and agree as  
3 follows:

- 4 1. On August 28, 2020, Deutsche Bank filed its Complaint in Eighth Judicial District  
5 Court, Case No. A-20-820307-C;
- 6 2. On August 30, 2020, FNTIC filed a Petition for Removal to this Court [ECF No. 1];
- 7 3. On September 21, 2020, FNTIC filed a Motion to Dismiss [ECF No. 13];
- 8 4. On September 21, 2020, Fidelity Agency filed a Motion to Dismiss [ECF No. 14];
- 9 5. On September 21, 2020, FNTG filed a Motion to Dismiss [ECF No. 15];
- 10 6. Deutsche Bank’s deadline to respond to all pending Motions to Dismiss is currently  
11 October 5, 2020;
- 12 7. Deutsche Bank’s counsel is requesting an extension until Wednesday, November 4,  
13 2020, to file its response to all pending Motions to Dismiss;
- 14 8. This extension is requested to allow counsel for Deutsche Bank additional time to  
15 review and respond to the points and authorities cited to in the Motions;
- 16 9. Counsel for FNTIC, Fidelity Agency and FNTG does not oppose the requested  
17 extension;
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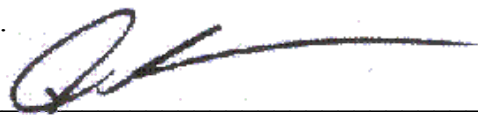
10. This is the first request for an extension which is made in good faith and not for purposes of delay.

**IT IS SO STIPULATED.**

<p>DATED this 25<sup>th</sup> day of September, 2020.</p> <p>WRIGHT, FINLAY &amp; ZAK, LLP</p> <p><u>/s/ Lindsay D. Robbins</u>  Lindsay D. Robbins, Esq.  Nevada Bar No. 13474  7785 W. Sahara Ave., Suite 200  Las Vegas, NV 89117  Attorneys for Plaintiff, Deutsche Bank National Trust Company, as Trustee, in Trust for the Registered Holders of Morgan Stanley ABS Capital I Trust 2004-HE8, Mortgage Pass-Through Certificates, Series 2004-HE8</p>	<p>DATED this 25<sup>th</sup> of September, 2020.</p> <p>SINCLAIR BRAUN LLP</p> <p><u>/s/ Kevin S. Sinclair</u>  Kevin S. Sinclair, Esq.  Nevada Bar No. 12277  16501 Ventura Boulevard, Suite 400  Encino, California 91436  Attorney for Defendants, Fidelity National Title Group, Inc., Fidelity National Title Insurance Company, and Fidelity National Title Agency of Nevada, Inc.</p>
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**IT IS SO ORDERED.**

Dated this 28th day of September, 2020.

  
UNITED STATES DISTRICT COURT JUDGE